



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

July 11, 2017

Mr. Stewart Fletcher
1250 St. George St.
East Liverpool, OH 43920-3400

Re: **Heritage Thermal Services
Resolution of Violation (ROV)
Air Permit
Columbiana County
0215020233**

Division of Air Pollution Control

Dear Mr. Fletcher:

Thank you for your June 26, 2017, response to Ohio EPA's May 26, 2017, Notice of Violation (NOV) letter. Your response included the actions that were taken immediately to return to compliance, the results of the investigation into the exceedance, and the measures that have been taken to prevent recurrence.

Ohio EPA has reviewed the information that you provided and has determined that Heritage Thermal Services has now resolved all the violations listed in the May 26, 2017, NOV. To ensure that all the violations have been addressed, Ohio EPA has included Heritage Thermal Services' response for each violation and its status.

Resolution of Violation

Letter Citation: Finding 1

Rule Citation: The terms and conditions of Title V permit P0108372, Ohio Revised Code 3734.05(J), and 40 CFR Part 63, Subpart EEE: *Hydrocarbon emissions from the stack shall not exceed 10 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, reported as propane.*

The information that was submitted on June 26, 2017, stated that the violation was immediately handled through an automatic waste feed cutoff, as documented in the quarterly report, which resulted in a decrease of the hydrocarbon (THC) emissions. Heritage Thermal Services then performed an investigation into the cause of the THC exceedance, uncovering a communication error in flushing timing between the operators and the control room, which caused a spike of flammable material and a combustion upset. The corrective action of communication with the employees and a revision to the written procedure will prevent future similar occurrences. Therefore, this violation is considered resolved.

MR. STEWART FLETCHER
JULY 11, 2017
PAGE 2

Please note that this does not preclude the Director from seeking administrative or civil penalties pursuant to ORC Section 3704.06 for the violation(s) noted in the May 26, 2017, NOV letter. The decision on whether to pursue or decline to pursue such penalties regarding these violations is dependent on several factors, one of which is the company's future compliance with Ohio EPA regulatory requirements.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact me by phone at (330) 963-1261 or by email at Jana.Gannon@epa.ohio.gov.

Sincerely,



Jana L. Gannon
Environmental Specialist
Division of Air Pollution Control
Northeast District Office

JLG:bo

cc: John Paulian/James Kavalec, DAPC/CO
Tim Fischer, Manager, DAPC/NEDO
Brian Dickens, U.S. EPA Region V